

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

PATRICIA DELAUGHTER,

Defendant.

Case No. 1:19-cr-00205-RDA



STATEMENT OF FACTS

The United States and the defendant, PATRICIA DELAUGHTER (hereinafter, “the defendant” or “DELAUGHTER”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The Bureau of Overseas Building Operations (OBO) of the U.S. Department of State (the Department) directs the design, construction, and use of U.S. embassies abroad. During the relevant period of time, DELAUGHTER and Public Official A were OBO employees who were responsible for procuring furniture for U.S. embassies. Steven Anstine was the Vice President of Sales for an American furniture company.

2. In or around December 2016, the Department was constructing a new embassy in a foreign nation. Public Official A was tasked with soliciting bid proposals from contractors for the procurement of furniture for the new embassy’s offices (the Embassy Furniture Project). DELAUGHTER also had access to the bid proposals.

3. From in or around December 2016 to in or around March 2017, DELAUGHTER, a present official of the United States Government who, by virtue of that office, employment, and relationship, had access to contractor bid and proposal information and source selection information, knowingly disclosed to Anstine contractor bid and proposal information and source

selection information for the Embassy Furniture Project. DELAUGHTER also intentionally aided and abetted Public Official A's disclosures to Anstine of contractor bid and proposal information and source selection information for the Embassy Furniture Project. The information that DELAUGHTER and Public Official A disclosed included bid prices and design plans of at least three bidding companies unaffiliated with Anstine's company. DELAUGHTER and Public Official A wanted to select Anstine's company for the procurement, which was put up for a competitive bid. DELAUGHTER and Public Official A disclosed the contractor bid and proposal information and source selection information for the Embassy Furniture Project to Anstine so that his company could win the contract for the Embassy Furniture Project.

4. DELAUGHTER knowingly disclosed, and intentionally aided and abetted Public Official A in disclosing, this competitor bid and proposal information and source selection information to Anstine before the award of the Department's procurement contract for the Embassy Furniture Project. DELAUGHTER knowingly disclosed, and intentionally aided and abetted Public Official A in disclosing, this information in order to give Anstine and his company a competitive advantage over the other bidding companies. DELAUGHTER's and Public Official A's disclosures of the information enabled Anstine to submit the lowest bid for the Embassy Furniture Project to the Department on at least two separate occasions. In or around March 2017, Anstine's company won the contract for the Embassy Furniture Project with a bid of approximately \$1,569,000.

5. On or about May 5, 2017, DELAUGHTER was interviewed by Special Agents of the Department's Office of Inspector General. DELAUGHTER made materially false statements during the interview. During the interview, DELAUGHTER knowingly, willfully, and intentionally falsely stated the following:

a. she had nothing to do with the Embassy Furniture Project; and  
b. she did not have a social relationship with Anstine and did not attended professional golf tournaments with him.

6. In truth and in fact, DELAUGHTER well knew and believed the following facts when she made each of the above statements:

a. from in or around December 2016 to in or around March 2017, DELAUGHTER participated in the process of soliciting bids for the Embassy Furniture Project and knowingly disclosed, and intentionally aided and abetted Public Official A in disclosing, to Anstine contractor bid and proposal information and source selection information for the Embassy Furniture Project; and

b. DELAUGHTER and Anstine had a social relationship and attended dinners, sporting events, and concerts together including, but not limited to, a September 2016 concert in Washington, D.C.; a December 2015 ballet performance in Washington, D.C; and summer 2015 and 2016 golf tournaments in Gainesville, Virginia and Bethesda, Maryland. Anstine paid at least a portion of DELAUGHTER's expenses for these events.

7. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

8. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

Date: *August 9, 2019*

By:

Russell L. Carlberg  
Assistant United States Attorney

AnnaLou Tirol  
Acting Chief  
Public Integrity Section

By:

Robert J. Heberle  
Deputy Chief  
John P. Taddei  
Trial Attorney

After consulting with my attorneys and pursuant to the plea agreement entered into this day between the defendant, PATRICIA DELAUGHTER, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



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PATRICIA DELAUGHTER

We are Danny C. Onorato and Stuart A. Sears, defendant's attorneys. We have carefully reviewed the above Statement of Facts with her. To our knowledge, her decision to stipulate to these facts is an informed and voluntary one.



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Danny C. Onorato, Esq.  
Attorney for PATRICIA DELAUGHTER



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Stuart A. Sears, Esq.  
Attorney for PATRICIA DELAUGHTER